

ELLIOTT & ELLIOTT, P.A.

ATTORNEYS AT LAW

721 OLIVE STREET

COLUMBIA, SOUTH CAROLINA 29205

[selliott@elliottlaw.us](mailto:selliott@elliottlaw.us)

SCOTT ELLIOTT

TELEPHONE (803) 771-0555

FACSIMILE (803) 771-8010

October 9, 2009

**VIA ELECTRONIC FILING**

Mr. Charles L.A. Terreni

Chief Clerk/Administrator

South Carolina Public Service Commission

101 Executive Center Drive

Columbia, South Carolina 29210

RE: State Universal Support of Basic Local Service Included in a Bundled Service  
Offering or Contract Offering  
Docket No. 2009-326-C

Dear Mr. Terreni:

Enclosed please find the Discovery Requests to South Carolina Cable Television Association, CompSouth, tw telecom of south carolina llc and Nuvox Communications, Incorporated filed on behalf of United Telephone Company of the Carolinas, LLC d/b/a CenturyLink in the above referenced docket. By copy of this letter, I am serving all parties of record.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Sincerely,

Elliott & Elliott, P.A.



Scott Elliott

SE/jcl

cc: All Parties of Record w/enc.

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

**DOCKET NO. 2009-326-C**

IN RE:	)	UNITED TELEPHONE COMPANY
	)	OF THE CAROLINAS, LLC d/b/a
State Universal Service Support of Basic	)	CENTURYLINK'S FIRST SET OF
Local Service Included in a Bundled	)	INTERROGATORIES AND
Service Offering or Contract Offering	)	REQUEST FOR PRODUCTION TO
	)	THE SOUTH CAROLINA CABLE
	)	TELEVISION ASSOCIATION,
	)	COMPSOUTH, tw telecom of south
	)	Carolina llc, AND NUVOX
	)	COMMUNICATIONS
	)	INCORPORATED

---

**TO: FRANK ELLERBE AND BONNIE SHEALY, COUNSEL FOR SOUTH  
CAROLINA CABLE TELEVISION ASSOCIATION, COMPSOUTH AND  
tw telecom of south carolina llc**

**JOHN J. PRINGLE, JR.  
COUNSEL FOR NUVOX COMMUNICATIONS INCORPORATED**

In accordance with 26 S.C. Regs 103-833 and other applicable rules of practice and procedure of the Public Service Commission of South Carolina ("Commission"), United Telephone Company of the Carolinas, LLC d/b/a CenturyLink ("CenturyLink") requests that the South Carolina Cable Television Association, CompSouth, tw telecom of south carolina llc, and Nuvox Communications Incorporated (collectively, "CLECs") respond to the following interrogatories and/or requests for production within twenty days of service.

**No. 1-1**

Please provide all responses to interrogatories or requests for production provided by each of the entities listed in the introductory paragraph above, or any of its members if that entity is an association, to any other party in this docket.

**No. 1-2**

Please list the members of the South Carolina Cable Television Association. For each member, please list the city and state of its principal headquarters. If the answer to this request is included in any of the information responsive to Request No. 1-1, an identification of where that information is located is a sufficient response to this Request.

**No. 1-3**

Please list the members of CompSouth. For each member, please list the city and state of its principal headquarters. If the answer to this request is included in any of the information responsive to Request No. 1-1, an identification of where that information is located is a sufficient response to this Request.

**No. 1-4**

For this Request, and for Request Nos. 1-5, 1-6 and 1-7, please refer to Attachment A, which is a listing of CenturyLink exchanges from CenturyLink's South Carolina General Exchange tariff.

For each entity listed in introductory paragraph to these Requests, or for any members of an entity that is an association, please identify: 1) whether each entity or any of its members currently provide basic local exchange telephone service, as that term is defined in S.C. Code Ann. Section 58-9-10, to customers in CenturyLink's service territory; 2)

the name of the entity providing the service; 3) the CenturyLink exchange where the service is provided; and 4) the number of customers who subscribe to the service.

**No. 1-5**

For each entity listed in introductory paragraph to these Requests, or for any members of an entity that is an association, please identify: 1) whether each entity or any of its members provide any bundled offerings or contract offerings, as those terms are defined in S.C. Code Ann. Section 58-9-285, to customers in CenturyLink's service territory; 2) the name of the entity providing the service; 3) the CenturyLink exchange where the service is provided; and 4) the number of customers who subscribe to the service.

**No. 1-6**

For each entity listed in introductory paragraph to these Requests, or for any members of an entity that is an association, please identify: 1) whether each entity or any of its members provide communications services, as that term is defined in S.C. Code Ann. Section 59-9-200(2), to customers in CenturyLink's service territory; 2) the name of the entity providing the services; 3) the CenturyLink exchange where the services are provided 4) and the number of customers who subscribe to the service.

**No. 1-7**

For each entity listed in the introductory paragraph to these Requests, or for any members of an entity that is an association, please list the total capital investment for each entity or any of its members in South Carolina from January 2005-the present. In addition, please provide the total number of employees resident in South Carolina for each entity or any of its members from January 2005-present.

Date this 9<sup>th</sup> day of October 2009.



---

Scott Elliott, Esquire  
Elliott & Elliott, P.A.  
721 Olive Street  
Columbia, SC 29205  
803-771-0555 (phone)  
803-771-8010 (fax)  
[selliott@elliottlaw.us](mailto:selliott@elliottlaw.us)

Susan S. Masterton, Esquire  
CenturyLink  
1313 Blair Stone Road  
Tallahassee, FL 32301  
850-599-1560 (phone)  
850-878-0777 (fax)  
[susan.masterton@embarq.com](mailto:susan.masterton@embarq.com)

Attorneys for United Telephone  
Company of the Carolinas d/b/a  
CenturyLink

## GENERAL SUBSCRIBER SERVICES TARIFF

United Telephone Company of the Carolinas

Eighteenth Revised Page 8  
Cancels Seventeenth Revised Page 8

ISSUED: September 29, 2008

EFFECTIVE: October 29, 2008

## U3. BASIC LOCAL EXCHANGE SERVICE

U3.3 MONTHLY EXCHANGE RATES (Cont'd)

## 3.3.4 RATES AND CHARGES (Cont'd)

- a. Residence and Business Local Exchange Service Lines  
(excludes Payphone Lines)

<u>Exchange</u>	<u>Rate Group</u>	<u>FLAT RATE</u>		<u>MEASURED</u>			
		<u>Res.</u>	<u>Bus.</u>	<u>Trunk</u>	<u>Res.</u>	<u>Bus.</u>	<u>Trunk</u>
Beaufort	2	\$16.50 (I)	\$34.00 (I)	\$55.59	\$7.40	\$19.02	\$33.37
Branchville	2	16.50	34.00	55.59	7.40	19.02	33.37
Chappells	2	16.50	34.00	55.59	7.40	19.02	33.37
Cross Hill	2	16.50	34.00	55.59	7.40	19.02	33.37
Estill	1	15.00	32.00	48.98	6.50	16.73	29.37
Eutawville	1	15.00	32.00	48.98	6.50	16.73	29.37
Greenwood	2	16.50	34.00	55.59	7.40	19.02	33.37
Hampton	1	15.00	32.00	48.98	6.50	16.73	29.37
Hodges	2	16.50	34.00	55.59	7.40	19.02	33.37
Holly Hill	1	15.00	32.00	48.98	6.50	16.73	29.37
Laurel Bay	2	16.50 (I)	34.00	55.59	7.40	19.02	33.37
Low Country	3	18.00 (R)	37.00	63.21	9.42	21.61	37.93
Mountville	2	16.50 (I)	34.00	55.59	7.40	19.02	33.37
Ninety Six	2	16.50 (I)	34.00	55.59	7.40	19.02	33.37
Ridgeland	3	18.00 (R)	37.00 (I)	63.21	9.42	21.61	37.93
St. Helena							
Island	2	16.50 (I)	34.00 (I)	55.59	7.40	19.02	33.37
Saluda	2*	15.00	32.00	48.98	6.50	16.73	29.37
Troy	2	16.50	34.00	55.59	7.40	19.02	33.37
Ware Shoals	2	16.50 (I)	34.00 (I)	55.59	7.40	19.02	33.37

\* Greenwood - Saluda Counties EAS implemented May 1, 1995. Rate increases, due to rate regrouping, are not applicable at this time.

## CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: State Universal Service Support of Basic Local Service  
Included in a Bundler Service Offering or Contract Offering

DOCKET NO.: 2009-326-C

**PARTIES SERVED:**

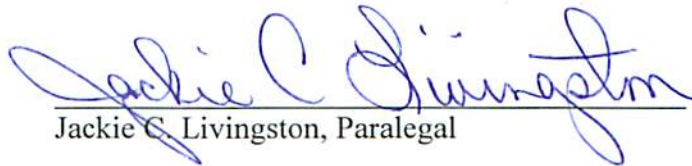
Benjamin P. Mustain, Esquire Willoughby & Hoefer, P.A. P. O. Box 8416 Columbia, SC 29202	John M.S. Hoefer, Esquire Willoughby & Hoefer, PA P. O. Box 8416 Columbia, SC 29202
John J. Pringle, Jr., Esquire Ellis, Lawhorne & Sims P. O. Box 2285 Columbia, SC 29202	M. John Bowen, Jr., Esquire McNair Law Firm. P.A. P. O. Box 11390 Columbia, SC 29211
Margaret M. Fox, Esquire McNair Law Firm, P.A. P. O. Box 11390 Columbia, SC 29211	Burnet R. Maybank, III, Esquire Nexsen Pruet, LLC 1230 Main Street, Suite 700 Columbia, SC 29202
Bonnie D. Shealy, Esquire Robinson, McFadden & Moore P. O. Box 944 Columbia, SC 29202	Frank R. Ellerbe, III, Esquire Robinson, McFadden & Moore P. O. Box 944 Columbia, SC 29202
William R. Atkinson, Esq. Sprint Nextel 233 Peachtree St., Suite 2200 Atlanta, GA 30303	Susan S. Masterton, Esquire CenturyLink 1313 Blair Stone Road Tallahassee, FL 32301
Zel Gilbert CenturyLink 1122 Lady Street, Ste. 825 Columbia, SC 29201	Stan Bugner Verizon South, Inc. 1301 Gervais Street, Ste. 825 Columbia, SC 29201
Seven W. Hamm, Esquire Richardson Plowden Carpenter & Robinson, PA P. O. Box 7788 Columbia, SC 29202	Nanette S. Edwards, Esquire Office of Regulatory Staff P. O. Box 11263 Columbia, SC 29211

Patrick W. Turner BellSouth Telecommunications, Inc. 1600 William Street, Ste. 5200 Columbia, SC 29201	
--	--

PLEADING:

Discovery Requests to South Carolina Cable Television  
Association, CompSouth, tw telecom of south Carolina llc and  
Nuvox Communications, Incorporated

October 9, 2009

  
Jackie C. Livingston, Paralegal